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ORIGINAL

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FILED MAR 27 2007
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAR 27 2007
at 10 o'clock AM P.M.
SUE SOTIA, CLERK

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Attorneys for Plaintiff
CHRISTOPHER GAHR

**UNITED STATES DISTRICT COURT,
DISTRICT OF HAWAII.**

LUCAS BRUNO III, CHRISTOPHER
GAHR, FRANK ROBERT PAULSON,
CHARLES TURNER, TOM YOUNG,

CIVIL NO. 03-00567-JM:BMK

WITNESS LIST.

Trial Date: Apr. 17, 2007.

Judge: The Hon. J. Michael Seabright

Plaintiffs,

v.

MICHAEL CHERTOFF, Secretary,
DEPARTMENT OF HOMELAND
SECURITY,

Defendant.

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Witness List-Bruno v. Chertoff - 1

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I. Christopher Gahr.

SUMMARY: He would testify that he was terminated for on the basis of race and age; that he had served the TSA for 6 months prior to being transferred to Maui; that he worked only 3 days in Maui prior to being terminated; and that the reasons for his termination were false.

II. Thomas Young

SUMMARY: He would testify that Managers in the TSA at OGG laughed about the reasons for Gahr's termination; that a manager in the TSA at Maui laughingly referred to Gahr as a "goofy White guy;" that managers often used the derogatory term "Haole;" that racism was both accepted and encouraged by the TSA management in Maui; and that disparate treatment was both accepted and encouraged by the TSA management in Maui.

III. Lucas Bruno

SUMMARY: He will testify that the Managers in the TSA at Maui intentionally set up circumstances to trap White employees into the appearance of substandard performance; that White employees were routinely berated and embarrassed in front of passengers and team members; and that Asian Pacific Islander employees were treated more favorably than White employees.

IV. Charles Turner

SUMMARY: He will testify that Patti Igarashi violated security procedures on the night of October 19, 2002, for the purpose of embarrassing Gahr; and that Gahr was meticulous regarding procedures and equipment.

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V. Liz Masuda

SUMMARY: She will testify that Manager Igarashi ordered her to write up White employees, so that they could be terminated; and that Manager Igarashi stated, "It is brown for brown, or white for white and if you don't learn that you will find yourself on lane five!" (Lane five is a euphemism for being terminated).

VI. Theresa Greenisen

SUMMARY: She will testify that during the incident on October 17, 2002, Manager Filbert Carvalho sent her home for having a sprained finger; that Gahr acted professionally and respectfully; that Carvalho acted disrespectfully and irrationally; and that Gahr offered logical solutions to resolve the dilemma.

VII. Karin Phaneuf

SUMMARY: She will testify that Gahr was meticulous about equipment and procedures; that previous managers and supervisors did not use the radios in question; that Gahr put the radios into use because White screeners complained that they were being exiled to the exit lanes for 10 hours with no breaks and no communications; that the radios were nearly useless in the airport; that the management in TSA at Maui targeted Gahr for termination because he was an effective manager and supervisor; that Edward Kaupie (Gahr's replacement) was her former Prison inmate; that Manager Igarashi required personnel to bring in birth certificates prior to passing out promotions; and that personnel hired and paid by the federal government to be screeners, were placed into supervisor positions because they were Pacific Islanders; that personnel hired and paid by the federal government to be Supervisors were relegated to the position of screener because they were Caucasian.

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Witness List-Bruno v. Chertoff - 3

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VIII. Deborah Pike

SUMMARY: She will testify that that Edward Kaupie (Gahr's replacement) was her former Prison inmate while she was a prison guard; that Gahr put the radios into use because several White screeners complained that they were being exiled to the exit lanes for 10 hours with no breaks and no communications; that Gahr was meticulous about equipment and procedures; that previous managers and supervisors refused to use the radios in question because they were of such poor quality; that the radios were nearly useless in the airport; that the management in TSA at Maui targeted Gahr for termination because he was an effective manager and supervisor; that promotions were based birth certificates; that personnel hired and paid by the federal government to be screeners, were placed into supervisor positions because they were Pacific Islanders; and that personnel hired and paid by the federal government to be Supervisors were relegated to the position of screener because they were Caucasian.

IX. Lt Col Michael Ferrel (US Army, Ret.)

SUMMARY: He will testify that he applied to several positions with the TSA in Maui, where he was living while serving as the Anti Terrorism Officer for US Forces, Pacific, and that during a phone conversation with Federal Security Director Lowrey Leong, Leong stated that he (Leong) did not want Caucasian people working in his airport.

X. Heather Boyem

SUMMARY: She will testify that disparate treatment was accepted and encouraged by the Managers in the TSA at Maui; that the radios were not used until Gahr put them in use, because they were of very low quality; that she overheard Manager Carvalho telling Manager Igarashi, "Here comes that Haole Witness List-Bruno v. Chertoff - 4

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Gahr, We need to get rid of that Asshole;" and that Gahr was meticulous about equipment and procedures.

XI. Justin Thomas

SUMMARY: Will testify that TSA management in Maui had a group of personnel that it intended to terminate prior to the group completing OJT; that the radios in question were of very poor quality and seldom used; that Gahr was meticulous about equipment and procedures.

XII. Farah Taja Mohammed

SUMMARY: She is a former translator from Iraq who worked with Gahr at Baghdad International Airport. She will testify that Gahr was meticulous worker; that Gahr was very good at dealing with people; that Gahr is culturally sensitive.

XIII. Mukdam Kudham

SUMMARY: He is an Iraqi who formerly working as a translator for the US Army at Regimental level, and as a translator for the Central Intelligence Agency. He worked directly for Gahr at Baghdad International Airport. He will testify that Gahr is culturally sensitive; that he is a great manager and a very meticulous about equipment; that Gahr is extremely conscientious about airport security.

XIV. Roger Yee

SUMMARY: He is Gahr's former supervisor at John Wayne International Airport. He will testify that Gahr is a very conscientious worker and very good at dealing with people in high stress situations.

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Witness List-Bruno v. Chertoff - 5

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XV. Frank Feldman

SUMMARY: He is a former employer of Gahr. He will testify that Gahr DID NOT forge a letter and his name as claimed by former defendant San Bernardino School District, that Gahr was a conscientious worker and very meticulous about security and equipment.

XVI. Lowrey Leong

SUMMARY: He would testify that he ordered Howard Tagamori to investigate the allegations lodged at Gahr by Carvalho, Igarashi, and Collins.

XVII. Howard Tagamori

SUMMARY: He would testify that Leong ordered him to investigate the allegations lodged at Gahr by Carvalho, Igarashi, and Collins, but that he failed to investigate as ordered by Leong and by TSA policy.

XVIII. Patti Igarashi

SUMMARY: She would testify that Gahr was treated less favorably than people of other races in the same position;

XIX. Pat Collins

SUMMARY: He would testify that he uses the words, "Nigger", "Spic", and "Gook"; and that statements were written and submitted to the EEOC several months after the incidents.

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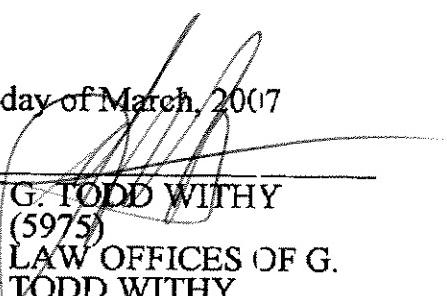
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XX. John Doe I

SUMMARY: Exact name will be subpoenaed from the TSA. He would testify that he is a screener at Dulles International Airport, who was hired to be a screener in spite of having lost his left arm, that he has been celebrated in newspapers and television for doing his job with only one arm; and that the statements by Manager Carvalho about public perception about seeing a screener with a handicap are rubbish.

Dated this 26th day of March, 2007

By:


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^{27th}

Dated this 27th day of March, 2007

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CERTIFICATE OF SERVICE.

I HEREBY CERTIFY that, on the date and by method of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served by First Class mail and E-mail, & Fax

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March 26, 2007 at San Bernardino, California



Witness List-Bruno v. Chertoff - 8

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